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Litton

Advanced Circuitry

RCRA PERMITTING & COMPLIANCE BRANCH
(TPCB)

4811 W. Kearney
P.O. Box 2847
Springfield, Missouri
65801-0847
417 862-0751

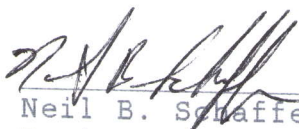
July 18, 1996

EPA Region VII Administrator
726 Minnesota Ave.
Kansas City, KS 66101

Dear Administrator:

Enclosed you will find our Revised Contingency Plan for your records. Should you have any questions, please feel free to contact me at (417) 862-0751 ext. 350.

Sincerely,


Neil B. Schaffer
Environmental Engineer

NBS/mec



R00058083
RCRA Records Center

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RCRA PERMITTING & COMPLIANCE BRANCH
(RPCB)

HAZARDOUS WASTE MANAGEMENT PROGRAM
CONTINGENCY PLAN

Revised: June 27, 1996

This information is presented in accordance with the requirements for a Contingency Plan per 40 CFR 262.34 and 265 Subpart D.,

I. EMERGENCY COORDINATORS

- A. If an emergency situation develops at the facility due to hazardous chemicals or hazardous wastes, the discoverer shall contact maintenance who will then contact an Emergency Coordinator as listed in Table 1. Neil B. Schaffer, the primary Emergency Coordinator, should be contacted first. If he is unavailable, the others should be contacted as listed, until someone is reached. The primary Emergency Coordinator and alternates have complete authority to commit all resources of the Company in the event of an emergency.

1. TABLE 1: EMERGENCY COORDINATORS

Name	Title	Ext #	Home #	Address
Neil Schaffer	Env. Eng.	350	863-9660	919 B N. Homewood Ave. Spfd, MO 65803
Bill Cameron	Fac. Mgr.	276	883-4285	1927 S. Grant Spfd, MO 65807
Ron Moss	Fac. Mgr.	315	883-1819	1358 E. Price Spfd, MO 65804

2. EMERGENCY PHONE NUMBERS

ORGANIZATION

PHONE NUMBER

- | | |
|--|----------|
| * Jim Dancey, Chief of Operations
Springfield Fire Department
235 N. Kimbrough, Spfd, MO 65806 | 864-1500 |
| * Capt. Crick
Springfield Police Department
(for EVAC purposes only)
321 E. Chestnut Expressway, Spfd, MO 65802 | 864-1810 |
| * Cox Poison Center
(contact only in case of injured employees only) | 831-9746 |

* Laura Glenn
Dir. of Public Information
Lester E. Cox Medical Centers - North
1423 N. Jefferson, Spfd, MO 65802

836-3000

ORGANIZATION

* MDNR (report spill only) Missouri Emergency Response Unit Ken Teeter P. O. Box 3133, Jefferson City, MO 65102	1-314-634-2436
* MDNR (report spill only) Missouri Emergency Response Comm. P.O. Box 176, Jefferson City, MO 65102	1-314-634-2436
* National Response Center Commandant G-DGC2 USCG Washington, D.C. 20593-0001	1-800-424-8802
Chemtrec	1-800-424-9300
Reidel Environmental Services (for emergency response services only)	1-800-334-0004
* EPA Region VII Administrator 726 Minnesota Ave., Kansas City, KS 66101	1-913-551-7006
* Joye McElwee Greene County/Springfield Environmental Planning Commission 833 Boonville, Spfd, MO 65807	869-6040
* Springfield Office of the DNR Chuck Kroeger 2040 E. Woodland, Spfd, MO 65807	871-4300

* Those with asterics need to be contacted immediately after a release, fire, or explosion that threatens human health, the environment, or exceeds the RQ under SARA Section 303, 304 and as well as Cercla 102.

II. PREPAREDNESS

A. EMERGENCY EQUIPMENT

Location of emergency equipment is listed in a table at the end of this document. This table includes the proper usage of each piece of equipment. This equipment is for use in containing and cleaning up spilled hazardous chemicals and waste. Fire extinguishers are readily available in each process area. All fire extinguishers comply with National Fire Code standards for portable fire extinguishers. Extinguishers are recharged after usage and inspected twice monthly.

1. For information on the communication and alarm systems see part "E" this section.
2. Training on emergency equipment: Training on all aspects of this equipment are given during annual RCRA training as well as to the individual members of the CIT.
3. Any repair or replacement of emergency equipment should be immediately arranged through the Environmental Control Department.
4. Monitoring equipment (Draeger pump and tubes) are available from Personnel and may be used by the EC to determine whether fume levels are permissible or not for employee exposure.
5. First-Aid supplies are located throughout the plant and contain the following:
 - a. Bandage materials (band-aids, gauze, adhesive tape, butterfly bandages)
 - b. Antibacterial ointments
 - c. Splints
 - d. Aspirin
6. Emergency eyewash fountains and showers (used for decontamination) are located throughout the plant. Each unit consists of a drench shower and an eyewash.

TABLE 1

EMEQ			
NAME	LOCATION	DESCRIPTION	USE
LIMB/STAND	N. EDGE OF PARKING LOT	GRAY GRANUALS	SPILL CONTROL
FRONT END LOADER	ENVIRONMENTAL CONTROL DEPT.	JOHN DEERE 301A	MOVE LIMB/SAND
CAUSTIC SODA	WAREHOUSE	WHITE GRANUAL	NEUTRAL ACIDS
SHOVEL	ENVIRONMENTAL CONTROL DEPT.	LONG HANDLE	ON LIMB/SAND AND CAUSTIC
BAGS	ENVIRONMENTAL CONTROL DEPT.	1 CU. YARD WHITE	CONTAIN
DRUMS	ENVIRONMENTAL CONTROL DEPT.	BLACK PLASTIC LINED	CONTAIN

B. COORDINATION AGREEMENTS

1. Copies of response agreements are kept on file in the "RCRA Compliance Manual" in the Environmental Engineer's office at Litton.
2. Copies of the Contingency Plan, as well as any revisions that may be made, as required, are forwarded to the following:

- a. Springfield Fire Dept. (SFD) (primary responder)
- b. Springfield Police Department
- c. Lester E. Cox North Medical Center
- d. Missouri Emergency Response Center
- e. Greene County/Springfield Emergency Planning Commission

C. EVACUATION PLAN

1. The EC is responsible for determining which emergency situations require plant evacuation. Prior to initiating plant evacuation, the EC shall notify the General Manager or highest official available at the facility. Plant evacuation will follow the guidelines specified in the companies Emergency Action Plan.

D. AUTOMATIC WASTE FEED CUT-OFF SYSTEMS

1. Automatic hazardous waste feed systems shall be shut-down as deemed necessary by the EC.
2. Shut-down procedures for specific hazardous waste feed systems are as follows:
 - a. Sludge dryers - Press red emergency stop on top of control panel.

E. COMMUNICATION AND ALARM SYSTEMS

1. Communication:
 - a. For access to an outside line (for the purposes of contacting EC on call, police, fire, etc.) dial 9 and wait for the dial tone, then dial number desired.
2. Alarm:
 - a. Pick up receiver, dial 87 (this activates the intercom), relay nature of emergency or plan of action.
3. Evacuation alarm:
 - a. Contact guard for initiating audible (buzzer) alarm for plant-wide evacuation.
4. Two-Way Radios:
 - a. Two-way push button radios are also available for the CIT as needed.

F. MISC. INFORMATION

1. Locations of hazardous wastes: (see attached map for specific locations in the facility)
 - a. Filtercake sludge from Electroplating Processes F006 Environmental Control Department
 - b. Mercury Bulbs - D009 - Environmental Control
 - c. Cyanide Wipes - D003 - Final Inspection
 - d. Solder Bath Filters - D008 - Environmental Control
2. Work stations - Employees may be working throughout the facility at any time.
3. Entrances (3) to the facility may be found on the south side of the plant. There are two street accesses (2) from Kearney and also one on the west side from the Springfield Municipal Airport Road.

III. RESPONSE GUIDELINES

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow, as closely as possible, the plan outlined. However, in specific emergency situations, the EC may deviate from the procedures to provide a more effective plan for bringing the situation under control.

- A. The employee discovering the emergency shall contact maintenance and security, who are responsible for containing the EC. Maintenance or Security shall then page for the "'Chemical Team' to area". Upon their arrival, the employee who witnessed the event shall inform the Chemical Investigation Team (CIT) of what chemical is involved, where it is, how much and if there are any injured employees.
- B. The responding members of the CIT shall respond to the area announced in the page. If a spill of hazardous material is confirmed then the Team Captain shall immediately set-up a command center near the release, directly upwind and a safe distance from the area. In the event of an emergency situation, the EC will be notified first; subsequently all facility personnel, appropriate federal, state or local agencies will also be notified. Initial response to any emergency will be to protect human health and safety, then the environment. Identification, containment, treatment, and disposal assessment will be secondary responses.
- C. The Emergency Coordinator (EC) shall take the following steps:
 1. The EC will immediately identify the character, exact source, amount and area of the extent of the release. If the released material cannot be identified, and if safety allows, samples will be taken for chemical analysis.
 2. The EC will immediately assess all possible hazards, both direct and indirect, to human health or the environment.
 3. Determine if there are any injured personnel and determine rescue procedures.
 4. Assess if an evacuation of the immediate area is necessary, and if so initiate the evacuation. (See I this section)
 - a. For small leaks/spills, isolate at least 50 feet in all directions.
 - b. For large spills/leaks, initially isolate at least 100 feet in all directions.
 - c. Keep all persons upwind of spill.
 5. The EC shall brief the head of the Chemical Investigation Team on the known scope of the problem.
 6. The EC shall direct the response team to assess the potential health threat to any response activity.

This includes having the Hazard Assessment Technician for the team doing air samples.

7. If the accident is beyond plant capabilities, the EC will contact the appropriate agencies listed in Table 2. The EC shall NOT initiate clean-up action if there is a threat to human health as defined by 29 CFR 1910.120. This includes any potential for skin contact or vapor levels above the TLV/PEL in the response area. Under these conditions rescue of injured employees will be forbidden and will be accomplished by responding Fire Fighters
 8. If there is no significant health threat in the response area then the EC shall work with the head of the Chemical Investigation Team to develop a clean-up plan and initiate response. (See H this section.)
- D. The EC shall develop a flow chart showing chain-of-command and personnel assignments for each position. This flow chart shall be developed in advance for each shift.
- E. The following people shall comprise the personnel initially responding to a page for the "Chemical Team to...area."
1. Members of the Chemical Investigation Team (including Operations Officer)
 2. The Cot Crew (including Nurse)
- F. The following personnel shall respond if summoned by the EC:
1. Resource/Logistics
 2. Public Relations/Liaison
 3. Other ECs
 4. Safety Officer
 5. Planning/Logistics
 6. Finance
 7. Facilities
- G. Description of each group and their function:
- Chemical Investigation Team - This teams responsibilities are to do a health and safety assessment of the hazard area. They are also responsible for cleaning up non-hazardous spills (See III Sec. C-7). The CIT shall make every effort to clean-up all releases remote from hazard.

Operation Officer - Head of Chemical Investigation Team.

Cot Crew - Their specific duties are specified in other company policies. In the event of a fire or spill involving chemicals the EC will use the Cot Crew to run crowd control. Security will also be used in this capacity. The company Nurse, if available, will head this team OR, if she is unavailable, the EC will assign a Resource Person.

Resource/Logistics - These people will respond with the following materials as requested by the EC, including; MSDS, technical data and additional personnel with technical skills. This position will be responsible for supplying responding SFD personnel a current map of the facility. They will also bring technical literature to the scene.

Public Relations/Liaison - This individual will be responsible for interfacing with media and government officials other than the response organizations.

Safety Officer - The Environmental Engineer and the Nurse shall function as Safety Officer. At any time they think the CIT is placing itself in a dangerous situation, they have the power to stop all emergency actions. If the SPD is responding then they shall inform the EC when they feel the hazard threat to the SPD has significantly increased.

Planning and Logistics - These individuals do the planning of how the necessary material for the clean-up activity will be acquired, transported and delivered to the CIT or SPD.

Finance - These people shall issue PO numbers and call in orders for any material needed by the EC.

Facilities - The facilities team shall be composed of a minimum of a Senior Maintenance Tech. As well as the Maintenance Technician for the immediate area where the hazard exists. Other Maintenance Technicians can be called in as necessary to join the team.

H. SPECIAL CONTROL PROCEDURES

1. FIRE AND/OR EXPLOSION:

- a. The Fire Crew will be on standby during all plant emergencies. If a fire should break out, concentration will be placed on preventing the fire from spreading to nearby areas. The fire fighting effort will be carried out until outside assistance has arrived. The Fire Crew will only fight incipient stage fires. They will be used only for evacuation and crowd control on structural fires.
- b. The following actions will be taken in the areas affected by the fire or explosion:
 - i. Fire doors will be closed.
 - ii. Work in the area will be terminated immediately.
 - iii. All feed lines and equipment will be shut down as it becomes necessary and practical.
 - iv. The EC will be contacted.

- v. The area will be cleared of all personnel not actively involved in fighting the fire. These persons are to report to a designated rally point for accountability.
- vi. All injured persons will be removed from the area and medical treatment will be administered by qualified personnel.

2. RELEASE OF HIGHLY FLAMMABLE MATERIAL (e.g. propane, natural gas):

- a. The Fire Department shall be encouraged to notify all persons within at least a quarter of a mile radius of the release.
- b. All ignition sources within this area will be eliminated.
- c. Use of motor vehicles within this area will be terminated or restricted to avoid ignition of vapors, which can cause a flashback to the source and initial explosion of fire of wide dimensions.
- d. If the chances of an impending explosion are high, the entire area, within a 2,000 ft. radius of the source, must be evacuated.
- e. Fire fighting will not be done at the risk of injury to the persons involved; however, early containment of fires can significantly decrease total damage.

3. LEAK OR SPILL IN BULK STORAGE AREAS:

- a. All feed lines to storage areas will be locked-out/tagged-out.
- b. Immediately after the spill is detected, the material will be transferred to the waste treatment system or a contractor may be summoned to remove any contaminated materials.
- c. The material will then be hauled to an approved TSD facility.
- d. If for some reason a chemical spill is not contained, an area of isolation will be established around the spill and the materials involved.
- e. If the spill is large or involves a tank rupture, an initial isolation of 100 feet will be used.
 - i. Small spills or leaks from a tank will require evacuation of at least 50 feet in all directions, to allow for cleanup, repair, and to minimize exposure.
- f. When any spill occurs, only those persons involved in overseeing or performing cleanup operations will be allowed within the designated hazard area.
- g. When possible, the area will be closed or otherwise blocked off.
- h. If the spill results in the formation of a toxic vapor cloud, (by reaction with surrounding materials or by fire) and its release (due to high vapor

pressures under ambient conditions) threatens human health outside the evacuation zone, then further evacuation will be enforced.

I. SHUT-DOWN OF PLANT OPERATIONS

1. In the event that the EC finds it necessary to shut-down plant operations, the EC shall contact the General Manager or the highest official at the facility, prior to this action.
2. ACD is equipped with a warning system that has a specific alarm signal to initiate evacuation of all plant areas. In addition, the internal telephone system is used to notify key plant personnel as to the nature of the emergency and recommended plan of action.
3. In the event that a plant evacuation is called for by the EC, the following actions will be taken:
 - a. The signal for plant evacuation will be activated.
 - b. All personnel, visitors, and contractors will leave immediately through the designated emergency exits.
 - c. No persons shall remain in or re-enter the location, unless specifically authorized by the person or persons calling for the evacuation. In allowing this, the person in charge assumes responsibility for those persons within the hazardous perimeter.
 - d. All personnel are to be accounted for by their immediate supervisor. Supervisors will designate certain doors as the safest exits for his/her employees and will choose an alternate exit if the first choice is inaccessible.
 - e. During exit the supervisor should try to keep personnel grouped together.
 - f. Re-entry into the building will be made only after the clearance is given by the EC.
 - g. In all questions of accountability:
 - i. Immediate supervisors will be held responsible for those persons reporting to them.
 - ii. Visitors will be the responsibility of those employees they are seeing.
 - iii. Contractors are the responsibility of those administering the contract.

J. AREA OF PLANT EVACUATION

1. Will be necessary in the case of a major fire or explosion. Specifics are outlined under "General Evacuation Procedures". All personnel have been notified of evacuation procedures and means of exit from their respective work areas under this emergency action plan.
2. Until evacuation is signalled, all personnel who are not in an affected area will remain in their respective areas.

3. Contract personnel and visitors will be cleared from the area and instructed to report to the guard house or the lobby area for accountability.
4. The Incipient Fire Fighting Team Chief will be responsible for all fire-fighting efforts until outside assistance arrives. Supervisors of unaffected areas will stay with their personnel and be prepared to evacuate and account for all personnel under their supervision.
5. An "All Clear" signal will be given when the fire has been extinguished and the safety of the personnel is no longer endangered. The IFFT Chief will determine when the emergency has passed and will consult with the EC before the "All Clear" is given.
 - a. An area at least 500 feet wide and 1,000 feet long will be evacuated, downwind, if volatile materials are spilled or released.

IV. POST-RESPONSE ACTIVITIES

A. PREVENTION OF RECURRENCE

Fires, Explosions, Releases. Take action to prevent the recurrence and/or spread of fires, explosion, or releases.

1. Stopping processes and operations.
2. Collecting and containing released waste, and removing or isolating containers.
3. If the facility stops operations, in direct response to an emergency, the EC will monitor valves, pipes, and other equipment for leaks, pressure buildup, gas generation or ruptures.

B. STORAGE/TREATMENT OF RELEASED MATERIALS

1. Immediately after an emergency, the ED will make arrangements for treatment, storage, and/or disposal of recovered waste, contaminated soil, or any other contaminated material.

C. INCOMPATIBLE WASTES

1. The EC will ensure that wastes which may be incompatible with the released materials are not treated, stored, or disposed of until cleanup procedures are complete.

D. POST-EMERGENCY EQUIPMENT MAINTENANCE

1. After an emergency event, all emergency equipment will be cleaned so that it is ready for the reuse or, if needed, will be replaced.
 - a. Before operations are resumed, all safety equipment will be inspected and ready for reuse.

E. REQUIRED REPORTS

1. As required by Section 265.56(j), an emergency event (e.g. fire, explosions, etc.) that requires implementing the Contingency Plan will be reported in writing. The EC

will provide the necessary written reports, within one working day after the incident, to the following agencies: EPA, MERC, and LEPC.

F. AMENDMENTS TO THE CONTINGENCY PLAN

1. The Contingency Plan will be reviewed and immediately amended whenever the following occur:
 - a. The facility permit is revised.
 - b. The plan fails in an emergency.
 - c. The facility changes in design, construction, operation, maintenance, or other circumstances which increase the potential for fires, explosions, or releases of hazardous chemicals or wastes.
 - d. The list of Emergency Coordinators changes.
 - e. The list of emergency equipment changes.

V. RCRA TRAINING

All employees of Litton ACD who handle, or supervise employees who handle hazardous waste shall receive training annually. This training shall include, but not be limited to:

1. The contents of this contingency plan.
2. Hazardous Waste Management as specified in 40 CFR 260 and 10 CSR 25 - 3.260
3. Hazardous Waste Identification as specified in 40 CFR 261 and 10 CSR 25 - 4.261.
4. Generator requirements as specified in 40 CFR 262 and 10 CSR 25-5.262.
5. TSD requirements as they apply to larger quantity generators as specified in 40 CFR 264 and 10 CSR 25-7.264.
6. Specific hazardous waste management regulations as specified in 40 CFR 266 and 10 CSR 25 - 7.266.
7. Land ban regulations as specified in 40 CFR 268 and 10 CSR 25 - 7.268.
8. Infectious waste management under 10 CSR 86 - 7.
9. Waste oil requirements as specified in 10 CSR 25 - 11.010.

REPORT OF RELEASE, FIRE OR EXPLOSION

Name and Telephone Number of Caller:

Name

417-862-0751

Telephone Number

Name and Address of Facility
Litton, ACD, 4811 West Kearney, Springfield, MO 65803

Directions: Must give directions to facility (Fire and MERC only)

Date, Time, Duration and Type of Incident (Fire, Explosion, Etc.)

Date

Time

Type

Physical Form of Release: ____ Liquid ____ Gas ____ Solid

Name and Quantity of Materials Involved:

Name

Quantity

Is the item on the Extremely Hazardous Substance List (CERCLA 302)
or the Hazardous Substance List (CERCLA 307)?

Extend of Injuries:

Hazards to Human Health or the Environment:

Is the Evacuation of the Surrounding Area Necessary?

Potential Routes of Migration:

Characteristics of Surrounding Soil:

Results of Sampling Performed:

Proximity of Downgradient drinking water, surface water, and populated areas:

Summary of Clean-Up Plan:

Estimated Quantity and Disposition of Recovered Materials that may Result from the Accident:

<u>Quantity</u>	<u>Disposition</u>
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*Reporting is only required if the event involves hazardous waste and is a threat to human health or the environment off-site OR exceeds the Reportable Quantity on the SARA Title III list (see attached)

Give a statement that all emergency equipment will be decontaminated and functional prior to restarting the facility or operation in question.

<u>Agency Called</u>	<u>Time/Date</u>	<u>Contact Person</u>	<u>Report # (if appl)</u>	<u>Comments</u>
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Spfd Fire Dept.

Spfd Police Dept.

Cox North

MO Emergency Response

NRC

EPA

Env. Plan Comm.

Spfd DNR